

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.  
\_\_\_\_\_

FILED  
AUG 11 A 2:06  
CIVIL ACTION NO.

**04-cv-10357-RCL**

**MOTION OF HANANEL FOR LEAVE TO SUPPLEMENT RECORD IN THE  
ALTERNATIVE**

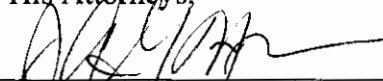
The Defendant, Moshe Hananel ("Hananel"), moves for leave to supplement the record if the Court determines that it is necessary. The Court's July 22, 2005 Order precluded the parties from filing reply affidavits and further briefing, but Hananel has obtained from public sources a copy of the Israeli corporate filings of the company IMD Soft showing its date of organization and can provide these to the Court if requested and additional information as appropriate. Hananel has also requested an opportunity to file reply affidavits and further briefing if the Court chooses to consider the information and documents which are the subject of Hananel's Motion (filed simultaneously herewith) to strike the Affidavits of Paul Roberts and Stephen O'Connor filed on August 5, 2005, as they fail to comply with the Court's Order of July 22, 2005.

WHEREFORE, the Court should grant Hananel leave to supplement the record as aforesaid if determined to be necessary.

Dated: August 10, 2005

MOSHE HANANEL

By His Attorneys,

 (by Adv)  
James A. G. Hamilton (BBO # 218760)  
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MotLvSupp-31216-1

I hereby certify that a true copy of the  
above document was served upon the  
attorney of record for each other party  
by mail hand on 8/10/05.  
